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March 4, 2022

Hon. Ann M. Donnelly
United States District Court
Eastern District of New York
100 Federal Plaza
Central Islip, NY 11722
via ECF

Re: All Systems Maintenance, Inc., et al. v. Giordano, et al.
Docket No. 21-cv-06412
Joint Status Letter

Your Honor:

I represent the Plaintiffs in the above referenced matter. I write in conjunction with Mr. Kaufman, counsel for defendant Giordano, to provide a status update to the Court. The parties have begun preliminary settlement discussions and wish to continue to explore a possible resolution. At this time, the parties respectfully request an adjournment to March 25, 2022, or another date convenient for the Court, to provide a status update on settlement.

Thank you for your consideration.

Respectfully submitted,

Russo Karl Widmaier & Cordano, PLLC

/s/ Christopher Gerace, Esq.

Law Office of Richard Kaufman, P.C.

/s/ Richard Kaufman, Esq.